

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

In re:

AMHERST TECHNOLOGIES, LLC, et al.

Debtors.

CHAPTER 7
CASE NO. 05-12831-JMD
(Jointly Administered)

Hearing Date: October 19, 2011

Hearing Time: 11:00 AM

**CHAPTER 7 TRUSTEE'S MOTION FOR AUTHORITY TO EMPLOY
UNITED BANKRUPTCY SERVICES, LLC AS COLLECTIONS AGENT**

Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014, Olga L. Gordon, the duly appointed Chapter 7 Trustee (the "Trustee") for the above-captioned debtors¹ (the "Debtors") hereby moves this Court for an Order authorizing her employment of United Bankruptcy Services, LLC (the "Collections Agent"), of Perkiomenville, Pennsylvania as her collections agent to assist in the collection of the amount due on the judgment obtained by the Trustee in this Court against Citicorp Credit Services, Inc., Adversary Proceeding No. 07-1007. In support of this Motion, the Trustee submits herewith the Affidavit of Larry Waslow.

In further support of this Motion, the Trustee states the following:

1. On July 20, 2005, the Debtors filed voluntary petitions pursuant to Chapter 11 of 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code").
2. On October 21, 2005, this case was converted to Chapter 7 of the Bankruptcy Code.

¹ The related debtors are the following entities: Amherst Technologies, LLC, Bk. No. 05-12831; Amherst, LLC, Bk. No. 05-12833; Amherst LA, LLC, Bk. No. 05-12840; Amherst West, LLC, Bk. No. 05-12841; Amherst Se, LLC, Bk. No. 05-12839; Amherst Computer Products SouthWest, LP, Bk. No. 05-12838; Amherst GOV, LLC, Bk. No. 05-12837; Amherst Distribution Services, LLC, Bk. No. 05-12835; ACP Sales, LLC, Bk. No. 05-12842; ACP SalesSE, LLC, Bk. No. 05-12843; and Technology Consulting Services, Inc., Bk. No. 05-12834.

3. On October 21, 2005, Olga L. Gordon was appointed as the Chapter 7 Trustee of the Debtors' bankruptcy estate.

4. The Trustee has obtained a judgment against the following defendant in this Court: Trustee v. Citicorp Credit Services, Inc., Adversary Proceeding No. 07-1007 (the "Judgment").

5. Subject to approval by this Court, the Trustee will enter into a Contingent Fee Agreement, attached hereto as Exhibit A, pursuant to which the Collections Agent will pursue collection of amounts due to the bankruptcy estate under to the Judgment (the "Agreement").

6. The Agreement provides that the Collections Agent will be entitled to a contingent fee of 33% of any funds recovered by the Collections Agent on behalf of the Debtor's estate (the "Fee"). The Contingent Fee further provides (i) that the Collections Agent must seek approval from the Bankruptcy Court for the payment of any expenses; and (ii) that the Collections Agent must seek approval from the Trustee and the Bankruptcy Court in order to accept less than the full amount due pursuant to the Judgment. The Trustee will file a fee application with the Court prior to disbursing any funds recovered by the Collections Agent.

7. To the best of the Trustee's knowledge, the Collections Agent does not represent any interest adverse to the estate of the Debtors and is a disinterested person as that term is defined in 11 U.S.C. § 101(14) as it applies to 11 U.S.C. § 327(a).

8. The Trustee believes that the employment of the Collections Agent is in the best interests of the bankruptcy estate because the Collections Agent has substantial experience in collecting similar types of judgments.

9. The Trustee requests that this Court waive the requirement set forth in LBR 7102(b)(3) that any motion filed shall have an accompanying memorandum of law since waiver of the requirement is appropriate for the relief requested herein.

WHEREFORE, the Trustee respectfully requests that this Court enter an Order authorizing the employment of United Bankruptcy Services, LLC pursuant to the terms of the Agreement.

Respectfully submitted,

OLGA L. GORDON, CHAPTER 7 TRUSTEE
FOR THE BANKRUPTCY ESTATE OF
AMHERST TECHNOLOGIES, LLC, et al.

/s/ Olga L. Gordon

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Dated: September 21, 2011